

STATE OF NORTH CAROLINA
COUNTY OF WAKE

IN THE GENERAL COURT OF JUSTICE
SUPERIOR COURT DIVISION
19CRS001934

STATE OF NORTH CAROLINA

v.

LESLIE MCCRAE DOWLESS

INDICTMENT- I. FELONIOUS OBSTRUCTION
OF JUSTICE

II. CONSPIRACY TO COMMIT FELONIOUS
OBSTRUCTION OF JUSTICE

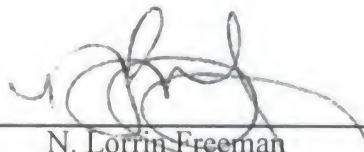
III. POSSESSION OF ABSENTEE BALLOT

- I. The jurors for the State upon their oath present that on or between September 21, 2018 through November 6, 2018 in Wake County, the defendant named above unlawfully, willfully, and feloniously did, with deceit and intent to defraud, obstruct public and legal justice by submitting or causing to be submitted by mail absentee ballots and container-return envelopes for those ballots to the Bladen County Board of Elections in such a manner so as to make it appear that those ballots had been voted and executed in compliance with the provisions of Article 21 of the North Carolina General Statutes Chapter 163A pertaining to absentee ballots when they in fact had not been so executed, to wit: defendant directed individuals to collect absentee ballots from voters, at times instructed individuals to sign certifications indicating they had witnessed the voter vote and properly execute the absentee ballot when they had not, and mailed or instructed others to mail the absentee ballot in such a manner to conceal the fact that the voter had not personally mailed it himself. As a result, these spoiled absentee ballots were counted by the local Board of Election and the total tally thereof forwarded to the North Carolina State Board of Elections in Wake County, North Carolina pursuant to N.C.G.S. 163A-1315(7) (fmr 163-234) who has the duty under N.C.G.S. 163A-741 (fmr 163-22) to tabulate primary and general election returns and to declare results for those offices which according to State law shall be tabulated by the North Carolina State Board of Elections. This act did obstruct public justice by resulting in the counting of spoiled absentee ballots that had not been executed in compliance with State law. It thereby

served to undermine the integrity of the absentee ballot process and the public's confidence in the outcome of the electoral process. This offense was done with deceit and intent to defraud and against the peace and dignity of the State. This act was done in violation of the Common Law and punishable pursuant to N.C.G.S. 14-3(b).

- II. The jurors for the State upon their oath present that on or between September 21, 2018 through November 6, 2018, in Wake County the defendant named above unlawfully, willfully, and feloniously did conspire with others, including but not limited to, Lisa Britt and Kelly N. Hendrix, with deceit and intent to defraud, to obstruct public and legal justice by submitting or causing to be submitted by mail absentee ballots and container return envelopes for those ballots to the Bladen County Board of Elections in such a manner so as to make it appear that those ballots had been voted and executed in compliance with the provisions of Article 21 of the North Carolina General Statutes Chapter 163A pertaining to absentee ballots when they in fact had not been so executed, to wit: ballots were collected from voters and taken into possession unlawfully; witness certifications were signed indicating the signor had witnessed the voter vote the absentee ballot when he or she had not, and the ballots were mailed in such a manner to conceal the fact that the voter had not personally mailed it himself. These spoiled absentee ballots were counted by the local Board of Election and the total tally thereof forwarded to the North Carolina State Board of Elections in Wake County, North Carolina pursuant to N.C.G.S. 163A-1315(7) (fmr 163-234) who has the duty under N.C.G.S. 163A-741 (fmr 163-22) to tabulate primary and general election returns and to declare results for those offices which according to State law shall be tabulated by the North Carolina State Board of Elections. This act did obstruct public justice by resulting in the counting of spoiled absentee ballots that had not been executed in compliance with State law. It thereby served to undermine the integrity of the absentee ballot process and the public's confidence in the outcome of the electoral process. This offense was done with deceit and intent to defraud and against the peace and dignity of the State. This act was done in violation of the Common Law and punishable pursuant to N.C.G.S. 14-2.4.

III. The jurors for the State upon their oath present that on or about October 9, 2018 through October 15, 2018 in Bladen County the defendant named above unlawfully, willfully and feloniously did take into his possession for return to the Bladen County Board of Elections the absentee ballot of a voter, including, but not limited to, voters Jeffrey T. Merritt and Michael C. Packer. Defendant was neither the voters' near relative nor the voters' verifiable legal guardian. This act was done in violation of N.C.G.S. 163A-1298(5) (fmr 163-226.3).




N. Lorrin Freeman
District Attorney



Agent Faircloth, NCSBI
Witness

The witnesses marked "X" were sworn by the undersigned Foreman of the Grand Jury and, after hearing testimony, this bill was found to be:

 **A TRUE BILL** by twelve or more grand jurors, and I the undersigned Foreman of the Grand Jury, attest the concurrence of twelve or more grand jurors in this Bill of Indictment.

_____ **NOT A TRUE BILL.**

JUL 30 2019

Date



Grand Jury Foreman

STATE OF NORTH CAROLINA
COUNTY OF WAKE

IN THE GENERAL COURT OF JUSTICE
SUPERIOR COURT DIVISION
19CRS001935

STATE OF NORTH CAROLINA

v.

INDICTMENT-

LISA M. BRITT
(aka LISA M. KITCHENS)

I. CONSPIRACY TO COMMIT FELONIOUS
OBSTRUCTION OF JUSTICE
II. POSSESSION OF ABSENTEE BALLOT
III. VOTING AS A FELON

- I. The jurors for the State upon their oath present that on or between October 10, 2018 through October 22, 2018, in Wake County the defendant named above unlawfully, willfully, and feloniously did conspire with Leslie McCrae Dowless, with deceit and intent to defraud, obstruct public and legal justice by submitting or causing to be submitted by mail absentee ballots and container return envelopes for those ballots to the Bladen County Board of Elections in such a manner so as to make it appear that those ballots had been voted and executed in compliance with the provisions of Article 21 of the North Carolina General Statutes Chapter 163A pertaining to absentee ballots when they in fact had not been so executed, to wit: ballots were collected from voters and taken into possession unlawfully, witness certifications were signed indicating the signor had witnessed the voter vote the absentee ballot when he or she had not, and the ballots were mailed in such a manner to conceal the fact that the voter had not personally mailed it himself. These spoiled absentee ballots were counted by the local Board of Election and the total tally thereof forwarded to the North Carolina State Board of Elections in Wake County, North Carolina pursuant to N.C.G.S. 163A-1315(7) (fmr 163-234) who has the duty under N.C.G.S. 163A-741 (fmr 163-22) to tabulate primary and general election returns and to declare results for those offices which according to State law shall be tabulated by the North Carolina State Board of Elections. This act did obstruct public justice by resulting in the counting of spoiled absentee ballots that had not been executed in compliance with State law. It thereby served to undermine the integrity of the


absentee ballot process and the public's confidence in the outcome of the electoral process. This offense was done with deceit and intent to defraud and against the peace and dignity of the State. This act was done in violation of the Common Law and punishable pursuant to N.C.G.S. 14-2.4.

- II. The jurors for the State upon their oath present that on or between October 10, 2018 through October 22, 2018 in Bladen County the defendant named above unlawfully, willfully and feloniously did take into her possession for return to the Bladen County Board of Elections the absentee ballot of a voter, including, but not limited to, voters Stacy E. Holcomb and Shelley D. Hewett. Defendant was neither the voters' near relative nor the voters' verifiable legal guardian. This act was done in violation of N.C.G.S. 163A-1298(5) (fmr 163-226.3).
- III. The jurors for the State upon their oath present that on or about October 6, 2017, May 1, 2018 and October 9, 2018, in Bladen County, Defendant unlawfully, willfully, and feloniously did vote in a municipal, primary and general election, having been convicted of a felony which excluded her from being eligible to vote without her right to vote having been restored under the law. This act was done in violation of N.C.G.S. 163A-1389 (5) (fmr 163-275)


N. Lorrin Freeman
District Attorney


Joan Fleming, Chief Investigator, NC State Board of Elections
Witness

The witnesses marked "X" were sworn by the undersigned Foreman of the Grand Jury and, after hearing testimony, this bill was found to be:

 **A TRUE BILL** by twelve or more grand jurors, and I the undersigned Foreman of the Grand Jury, attest the concurrence of twelve or more grand jurors in this Bill of Indictment.

 **NOT A TRUE BILL.**

JUL 30 2019

Date


Grand Jury Foreman

STATE OF NORTH CAROLINA
COUNTY OF WAKE

IN THE GENERAL COURT OF JUSTICE
SUPERIOR COURT DIVISION
19CRS0001936


STATE OF NORTH CAROLINA

v.

INDICTMENT- I. FELONY SOLICITATION TO
COMMIT PERJURY

LESLIE MCCRAE DOWLESS

- I. The jurors for the State upon their oath present that on or about February 17, 2019 in Wake County the defendant named above unlawfully, willfully, and feloniously did encourage, advise, or counsel Lisa Britt to provide false information under oath and sworn affirmation during an evidentiary hearing being conducted by the North Carolina State Board of Elections into absentee ballot procedures affecting the 2018 General Election in Bladen County with the intent that Ms. Britt in fact testify falsely, to wit: Defendant provided to Ms. Britt a written statement for her to read during her testimony knowing said statement to be false. This act was done in violation of N.C.G.S. 14-209.




N. Lorrin Freeman
District Attorney



Joan Fleming, Chief Investigator, NC State Board of Elections
Witness

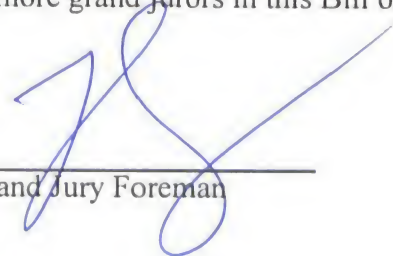
The witnesses marked "X" were sworn by the undersigned Foreman of the Grand Jury and, after hearing testimony, this bill was found to be:

 **A TRUE BILL** by twelve or more grand jurors, and I the undersigned Foreman of the Grand Jury, attest the concurrence of twelve or more grand jurors in this Bill of Indictment.

NOT A TRUE BILL.

JUL 30 2019

Date



Grand Jury Foreman

STATE OF NORTH CAROLINA
COUNTY OF WAKE

IN THE GENERAL COURT OF JUSTICE
SUPERIOR COURT DIVISION
19CRS001937

STATE OF NORTH CAROLINA

v.

INDICTMENT-

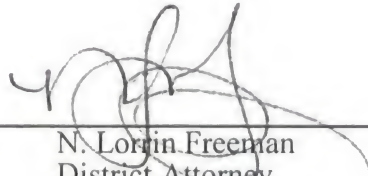
GINGER SHAE EASON

I. CONSPIRACY TO COMMIT FELONIOUS
OBSTRUCTION OF JUSTICE
II. POSSESSION OF ABSENTEE BALLOT

- I. The jurors for the State upon their oath present that on or between October 8, 2018 through October 16, 2018, in Wake County the defendant named above unlawfully, willfully, and feloniously did conspire with Leslie McCrae Dowless, with deceit and intent to defraud, obstruct public and legal justice by submitting or causing to be submitted by mail absentee ballots and container return envelopes for those ballots to the Bladen County Board of Elections in such a manner so as to make it appear that those ballots had been voted and executed in compliance with the provisions of Article 21 of the North Carolina General Statutes Chapter 163A pertaining to absentee ballots when they in fact had not been so executed, to wit: ballots were collected from voters and taken into possession unlawfully, witness certifications were signed indicating the signor had witnessed the voter vote the absentee ballot when he or she had not, and the ballots were mailed in such a manner to conceal the fact that the voter had not personally mailed it himself. These spoiled absentee ballots were counted by the local Board of Election and the total tally thereof forwarded to the North Carolina State Board of Elections in Wake County, North Carolina pursuant to N.C.G.S. 163A-1315(7) (fmr 163-234) who has the duty under N.C.G.S. 163A-741 (fmr 163-22) to tabulate primary and general election returns and to declare results for those offices which according to State law shall be tabulated by the North Carolina State Board of Elections. This act did obstruct public justice by resulting in the counting of spoiled absentee ballots that had not been executed in compliance with State law. It thereby served to undermine the integrity of the

absentee ballot process and the public's confidence in the outcome of the electoral process. This offense was done with deceit and intent to defraud and against the peace and dignity of the State. This act was done in violation of the Common Law and punishable pursuant to N.C.G.S. 14-2.4.

- II. The jurors for the State upon their oath present that on or between October 8, 2018 through October 16, 2018 in Bladen County the defendant named above unlawfully, willfully and feloniously did take into her possession for return to the Bladen County Board of Elections the absentee ballot of a voter, including, but not limited to, voters Danny K. Bryan and Kimberly S. Robinson. Defendant was neither the voters' near relative nor the voters' verifiable legal guardian. This act was done in violation of N.C.G.S. 163A-1298(5) (fmr 163-226.3).




N. Lorin Freeman
District Attorney



Joan Fleming, Chief Investigator, NC State Board of Elections
Witness

The witnesses marked "X" were sworn by the undersigned Foreman of the Grand Jury and, after hearing testimony, this bill was found to be:

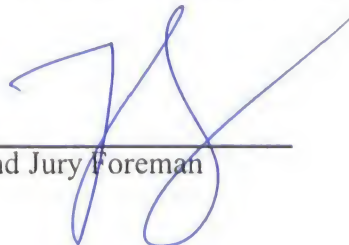


A TRUE BILL by twelve or more grand jurors, and I the undersigned Foreman of the Grand Jury, attest the concurrence of twelve or more grand jurors in this Bill of Indictment.

NOT A TRUE BILL.

JUL 3 0 2019

Date



Grand Jury Foreman

STATE OF NORTH CAROLINA
COUNTY OF WAKE

IN THE GENERAL COURT OF JUSTICE
SUPERIOR COURT DIVISION
19CRS001938

STATE OF NORTH CAROLINA

v.

INDICTMENT-


WOODY DARREL HESTER

I. CONSPIRACY TO COMMIT FELONIOUS
OBSTRUCTION OF JUSTICE
II. POSSESSION OF ABSENTEE BALLOT
III. CONSPIRACY TO COMMIT FELONIOUS
OBSTRUCTION OF JUSTICE

- I. The jurors for the State upon their oath present that on or between October 8, 2018 through October 26, 2018, in Wake County the defendant named above unlawfully, willfully, and feloniously did conspire with Leslie McCrae Dowless, with deceit and intent to defraud, obstruct public and legal justice by submitting or causing to be submitted by mail absentee ballots and container return envelopes for those ballots to the Bladen County Board of Elections in such a manner so as to make it appear that those ballots had been voted and executed in compliance with the provisions of Article 21 of the North Carolina General Statutes Chapter 163A pertaining to absentee ballots when they in fact had not been so executed, to wit: ballots were collected from voters and taken into possession unlawfully, witness certifications were signed indicating the signor had witnessed the voter vote the absentee ballot when he or she had not, and the ballots were mailed in such a manner to conceal the fact that the voter had not personally mailed it himself. These spoiled absentee ballots were counted by the local Board of Election and the total tally thereof forwarded to the North Carolina State Board of Elections in Wake County, North Carolina pursuant to N.C.G.S. 163A-1315(7) (fmr 163-234) who has the duty under N.C.G.S. 163A-741 (fmr 163-22) to tabulate primary and general election returns and to declare results for those offices which according to State law shall be tabulated by the North Carolina State Board of Elections. This act did obstruct public justice by resulting in the counting of spoiled absentee ballots that had not been executed

in compliance with State law. It thereby served to undermine the integrity of the absentee ballot process and the public's confidence in the outcome of the electoral process. This offense was done with deceit and intent to defraud and against the peace and dignity of the State. This act was done in violation of the Common Law and punishable pursuant to N.C.G.S. 14-2.4.

- II. The jurors for the State upon their oath present that on or about October 15, 2018 in Bladen County the defendant named above unlawfully, willfully and feloniously did take into his possession for return to the Bladen County Board of Elections the absentee ballot of Michael G. Kelly, a voter. Defendant was neither the voters' near relative nor the voters' verifiable legal guardian. This act was done in violation of N.C.G.S. 163A-1298(5) (fmr 163-226.3).
- III. The jurors for the State upon their oath present that on or about December 12, 2018 in Bladen County the defendant named above unlawfully, willfully, and feloniously did conspire with Leslie McCrae Dowless, with deceit and intent to defraud, to obstruct public and legal justice to provide false and misleading information to investigators with the North Carolina State Board of Elections and other legal entities conducting investigations into absentee ballot irregularities during the 2018 General Election, to wit: Defendant, Leslie McCrae Dowless and others met to discuss what statement they would provide to investigators and agreed to "stick together" and not to tell investigators that they had collected any absentee ballots from voters knowing the information to be provided would be false and misleading. This act did obstruct public justice by resulting in false information being provided to the North Carolina State Board of Elections investigators and the North Carolina State Bureau of Investigations . This offense was done with deceit and intent to defraud and against the peace and dignity of the State. This act was done in violation of the Common Law and punishable pursuant to N.C.G.S. 14-3(b).



N. Lorrie Freeman
District Attorney



Agent Scott Faircloth, NCSBI
Witness

The witnesses marked "X" were sworn by the undersigned Foreman of the Grand Jury and, after hearing testimony, this bill was found to be:

 X **A TRUE BILL** by twelve or more grand jurors, and I the undersigned Foreman of the Grand Jury, attest the concurrence of twelve or more grand jurors in this Bill of Indictment.

 NOT A TRUE BILL.

01 30 2019

Date



Grand Jury Foreman

STATE OF NORTH CAROLINA
COUNTY OF WAKE

IN THE GENERAL COURT OF JUSTICE
SUPERIOR COURT DIVISION
19CRS001939

STATE OF NORTH CAROLINA

v.

INDICTMENT-


JAMES R. SINGLETARY

I. CONSPIRACY TO COMMIT FELONIOUS
OBSTRUCTION OF JUSTICE
II. POSSESSION OF ABSENTEE BALLOT


- I. The jurors for the State upon their oath present that on or between October 17, 2018 through October 26, 2018, in Wake County the defendant named above unlawfully, willfully, and feloniously did conspire with Leslie McCrae Dowless, with deceit and intent to defraud, obstruct public and legal justice by submitting or causing to be submitted by mail absentee ballots and container return envelopes for those ballots to the Bladen County Board of Elections in such a manner so as to make it appear that those ballots had been voted and executed in compliance with the provisions of Article 21 of the North Carolina General Statutes Chapter 163A pertaining to absentee ballots when they in fact had not been so executed, to wit: ballots were collected from voters and taken into possession unlawfully, witness certifications were signed indicating the signor had witnessed the voter vote the absentee ballot when he or she had not, and the ballots were mailed in such a manner to conceal the fact that the voter had not personally mailed it himself. These spoiled absentee ballots were counted by the local Board of Election and the total tally thereof forwarded to the North Carolina State Board of Elections in Wake County, North Carolina pursuant to N.C.G.S. 163A-1315(7) (fmr 163-234) who has the duty under N.C.G.S. 163A-741 (fmr 163-22) to tabulate primary and general election returns and to declare results for those offices which according to State law shall be tabulated by the North Carolina State Board of Elections. This act did obstruct public justice by resulting in the counting of spoiled absentee ballots that had not been executed in compliance with State law. It thereby served to undermine the integrity of the absentee ballot process and the public's confidence in the outcome of the electoral

process. This offense was done with deceit and intent to defraud and against the peace and dignity of the State. This act was done in violation of the Common Law and punishable pursuant to N.C.G.S. 14-2.4.

- II. The jurors for the State upon their oath present that on or about October 17 and through October 26, 2018 in Bladen County the defendant named above unlawfully, willfully and feloniously did take into his possession for return to the Bladen County Board of Elections the absentee ballot of a voter, Samantha Hammond. Defendant was neither the voter's near relative nor the voter's verifiable legal guardian. This act was done in violation of N.C.G.S. 163A-1298(5) (fmr 163-226.3).




N. Lorin Freeman
District Attorney



Agent Scott Faircloth, NCSBI
Witness

The witnesses marked "X" were sworn by the undersigned Foreman of the Grand Jury and, after hearing testimony, this bill was found to be:



A TRUE BILL by twelve or more grand jurors, and I the undersigned Foreman of the Grand Jury, attest the concurrence of twelve or more grand jurors in this Bill of Indictment.

NOT A TRUE BILL.

JUL 30 2019

Date



Grand Jury Foreman

STATE OF NORTH CAROLINA
COUNTY OF WAKE

IN THE GENERAL COURT OF JUSTICE
SUPERIOR COURT DIVISION
19CRS001940

STATE OF NORTH CAROLINA

v.

INDICTMENT-

TONYA BRITT LONG

I. CONSPIRACY TO COMMIT FELONIOUS
OBSTRUCTION OF JUSTICE
II. SWEARING FALSELY

- I. The jurors for the State upon their oath present that on or between October 15, 2018 through October 18, 2018, in Wake County the defendant named above unlawfully, willfully, and feloniously did conspire with Leslie McCrae Dowless, with deceit and intent to defraud, obstruct public and legal justice by submitting or causing to be submitted by mail absentee ballots and container return envelopes for those ballots to the Bladen County Board of Elections in such a manner so as to make it appear that those ballots had been voted and executed in compliance with the provisions of Article 21 of the North Carolina General Statutes Chapter 163A pertaining to absentee ballots when they in fact had not been so executed, to wit: ballots were collected from voters and taken into possession unlawfully, witness certifications were signed indicating the signor had witnessed the voter vote the absentee ballot when he or she had not, and the ballots were mailed in such a manner to conceal the fact that the voter had not personally mailed it himself. These spoiled absentee ballots were counted by the local Board of Election and the total tally thereof forwarded to the North Carolina State Board of Elections in Wake County, North Carolina pursuant to N.C.G.S. 163A-1315(7) (fmr 163-234) who has the duty under N.C.G.S. 163A-741 (fmr 163-22) to tabulate primary and general election returns and to declare results for those offices which according to State law shall be tabulated by the North Carolina State Board of Elections. This act did obstruct public justice by resulting in the counting of spoiled absentee ballots that had not been executed in compliance with State law. It thereby served to undermine the integrity of the

absentee ballot process and the public's confidence in the outcome of the electoral process. This offense was done with deceit and intent to defraud and against the peace and dignity of the State. This act was done in violation of the Common Law and punishable pursuant to N.C.G.S. 14-2.4.

- II. The jurors for the State upon their oath present that on or about October 15, 2018 in Bladen County the defendant named above unlawfully, willfully and feloniously did falsely swear that a voter, Michael G. Kelly had completed an absentee ballot and signed the voter certification on the absentee ballot container in her presence, when he in fact did not, by signing the witness certification on the absentee ballot container envelope certifying as such. This act was done in violation of N.C.G.S. 163A-1389(2).




N. Lorrin Freeman
District Attorney



Agent Scott Faircloth, SBI
Witness

The witnesses marked "X" were sworn by the undersigned Foreman of the Grand Jury and, after hearing testimony, this bill was found to be:

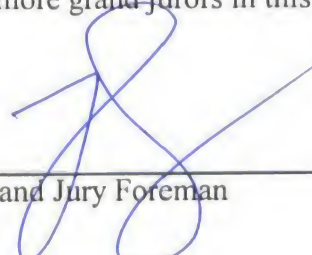


A TRUE BILL by twelve or more grand jurors, and I the undersigned Foreman of the Grand Jury, attest the concurrence of twelve or more grand jurors in this Bill of Indictment.

NOT A TRUE BILL.

JUL 30 2019

Date



Grand Jury Foreman

STATE OF NORTH CAROLINA
COUNTY OF WAKE

IN THE GENERAL COURT OF JUSTICE
SUPERIOR COURT DIVISION
19CRS001941

STATE OF NORTH CAROLINA

v.

INDICTMENT-

JESSICA H. DOWLESS

I. CONSPIRACY TO COMMIT FELONIOUS
OBSTRUCTION OF JUSTICE
II. SWEARING FALSELY

- I. The jurors for the State upon their oath present that on or between October 8, 2018 through October 26, 2018, in Wake County the defendant named above unlawfully, willfully, and feloniously did conspire with Leslie McCrae Dowless, with deceit and intent to defraud, obstruct public and legal justice by submitting or causing to be submitted by mail absentee ballots and container return envelopes for those ballots to the Bladen County Board of Elections in such a manner so as to make it appear that those ballots had been voted and executed in compliance with the provisions of Article 21 of the North Carolina General Statutes Chapter 163A pertaining to absentee ballots when they in fact had not been so executed, to wit: ballots were collected from voters and taken into possession unlawfully, witness certifications were signed indicating the signor had witnessed the voter vote the absentee ballot when he or she had not, and the ballots were mailed in such a manner to conceal the fact that the voter had not personally mailed it himself. These spoiled absentee ballots were counted by the local Board of Election and the total tally thereof forwarded to the North Carolina State Board of Elections in Wake County, North Carolina pursuant to N.C.G.S. 163A-1315(7) (fmr 163-234) who has the duty under N.C.G.S. 163A-741 (fmr 163-22) to tabulate primary and general election returns and to declare results for those offices which according to State law shall be tabulated by the North Carolina State Board of Elections. This act did obstruct public justice by resulting in the counting of spoiled absentee ballots that had not been executed in compliance with State law. It thereby served to undermine the integrity of the

absentee ballot process and the public's confidence in the outcome of the electoral process. This offense was done with deceit and intent to defraud and against the peace and dignity of the State. This act was done in violation of the Common Law and punishable pursuant to N.C.G.S. 14-2.4.

- II. The jurors for the State upon their oath present that on or between October 8, 2018 through October 23, 2018 in Bladen County the defendant named above unlawfully, willfully and feloniously did falsely swear that a voter, including, but not limited to, Derrick Hendrix and Thomas G. Berry, had completed an absentee ballot, and signed the voter certification on the absentee ballot container in her presence, by signing the witness certification on the absentee ballot container envelope certifying as such. This act was done in violation of N.C.G.S. 163A-1389(2).




N. Lorrin Freeman
District Attorney



Agent Scott Faircloth, SBI
Witness

The witnesses marked "X" were sworn by the undersigned Foreman of the Grand Jury and, after hearing testimony, this bill was found to be:



A TRUE BILL by twelve or more grand jurors, and I the undersigned Foreman of the Grand Jury, attest the concurrence of twelve or more grand jurors in this Bill of Indictment.

NOT A TRUE BILL.

JUL 3 0 2019

Date



Grand Jury Foreman

STATE OF NORTH CAROLINA
COUNTY OF WAKE

IN THE GENERAL COURT OF JUSTICE
SUPERIOR COURT DIVISION
19CRS001942

STATE OF NORTH CAROLINA

v.

INDICTMENT-

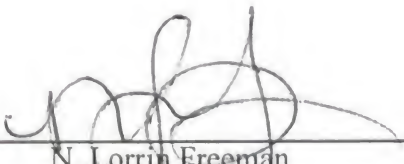
KELLY HENDRIX

I. CONSPIRACY TO COMMIT FELONIOUS
OBSTRUCTION OF JUSTICE
II. POSSESSION OF ABSENTEE BALLOT


- I. The jurors for the State upon their oath present that on or between October 10, 2018 through October 22, 2018, in Wake County the defendant named above unlawfully, willfully, and feloniously did conspire with Leslie McCrae Dowless, with deceit and intent to defraud, obstruct public and legal justice by submitting or causing to be submitted by mail absentee ballots and container return envelopes for those ballots to the Bladen County Board of Elections in such a manner so as to make it appear that those ballots had been voted and executed in compliance with the provisions of Article 21 of the North Carolina General Statutes Chapter 163A pertaining to absentee ballots when they in fact had not been so executed, to wit: ballots were collected from voters and taken into possession unlawfully, witness certifications were signed indicating the signor had witnessed the voter vote the absentee ballot when he or she had not, and the ballots were mailed in such a manner to conceal the fact that the voter had not personally mailed it himself. These spoiled absentee ballots were counted by the local Board of Election and the total tally thereof forwarded to the North Carolina State Board of Elections in Wake County, North Carolina pursuant to N.C.G.S. 163A-1315(7) (fmr 163-234) who has the duty under N.C.G.S. 163A-741 (fmr 163-22) to tabulate primary and general election returns and to declare results for those offices which according to State law shall be tabulated by the North Carolina State Board of Elections. This act did obstruct public justice by resulting in the counting of spoiled absentee ballots that had not been executed in compliance with State law. It thereby served to undermine the integrity of the

absentee ballot process and the public's confidence in the outcome of the electoral process. This offense was done with deceit and intent to defraud and against the peace and dignity of the State. This act was done in violation of the Common Law and punishable pursuant to N.C.G.S. 14-2.4.

- II. The jurors for the State upon their oath present that on or between October 10, 2018 through October 22, 2018 in Bladen County the defendant named above unlawfully, willfully and feloniously did take into her possession for return to the Bladen County Board of Elections the absentee ballot of a voter, including, but not limited to, voters Deborah S. Davis and Ricky L. Davis. Defendant was neither the voters' near relative nor the voters' verifiable legal guardian. This act was done in violation of N.C.G.S. 163A-1298(5) (fmr 163-226.3).




N. Lorrin Freeman
District Attorney



Joan Fleming, Chief Investigator, NC State Board of Elections
Witness

The witnesses marked "X" were sworn by the undersigned Foreman of the Grand Jury and, after hearing testimony, this bill was found to be:



A TRUE BILL by twelve or more grand jurors, and I the undersigned Foreman of the Grand Jury, attest the concurrence of twelve or more grand jurors in this Bill of Indictment.

NOT A TRUE BILL.

Jul 30 2019

Date



Grand Jury Foreman

STATE OF NORTH CAROLINA
COUNTY OF WAKE

IN THE GENERAL COURT OF JUSTICE
SUPERIOR COURT DIVISION
19CRS001943

STATE OF NORTH CAROLINA

v.

INDICTMENT-


KELLY HENDRIX

I. CONSPIRACY TO COMMIT FELONIOUS
OBSTRUCTION OF JUSTICE
II. POSSESSION OF ABSENTEE BALLOT

- I. The jurors for the State upon their oath present that on or between September 17, 2016 through November 6, 2016, in Wake County the defendant named above unlawfully, willfully, and feloniously did conspire with Leslie McCrae Dowless, with deceit and intent to defraud, obstruct public and legal justice by submitting or causing to be submitted by mail absentee ballots and container return envelopes for those ballots to the Bladen County Board of Elections in such a manner so as to make it appear that those ballots had been voted and executed in compliance with the provisions of Article 21 of the North Carolina General Statutes Chapter 163A pertaining to absentee ballots when they in fact had not been so executed, to wit: ballots were collected from voters and taken into possession unlawfully, witness certifications were signed indicating the signor had witnessed the voter vote the absentee ballot when he or she had not, and the ballots were mailed in such a manner to conceal the fact that the voter had not personally mailed it himself. These spoiled absentee ballots were counted by the local Board of Election and the total tally thereof forwarded to the North Carolina State Board of Elections in Wake County, North Carolina pursuant to N.C.G.S. 163A-1315(7) (fmr 163-234) who has the duty under N.C.G.S. 163A-741 (fmr 163-22) to tabulate primary and general election returns and to declare results for those offices which according to State law shall be tabulated by the North Carolina State Board of Elections. This act did obstruct public justice by resulting in the counting of spoiled absentee ballots that had not been executed in compliance with State law. It thereby served to undermine the integrity of the

absentee ballot process and the public's confidence in the outcome of the electoral process. This offense was done with deceit and intent to defraud and against the peace and dignity of the State. This act was done in violation of the Common Law and punishable pursuant to N.C.G.S. 14-2.4.

- II. The jurors for the State upon their oath present that on or between September 12, 2016 through September 17, 2016 in Bladen County the defendant named above unlawfully, willfully and feloniously did take into her possession for return to the Bladen County Board of Elections the absentee ballot of a voter, including, but not limited to, voters Chris Eason and Joshua Evans. Defendant was neither the voters' near relative nor the voters' verifiable legal guardian. This act was done in violation of N.C.G.S. 163A-1298(5) (fmr 163-226.3).




N. Lorrin Freeman
District Attorney



Agent Scott Faircloth, NCSBI
Witness

The witnesses marked "X" were sworn by the undersigned Foreman of the Grand Jury and, after hearing testimony, this bill was found to be:



A TRUE BILL by twelve or more grand jurors, and I the undersigned Foreman of the Grand Jury, attest the concurrence of twelve or more grand jurors in this Bill of Indictment.

NOT A TRUE BILL.

Jul 30 2019

Date



Grand Jury Foreman

STATE OF NORTH CAROLINA
COUNTY OF WAKE

IN THE GENERAL COURT OF JUSTICE
SUPERIOR COURT DIVISION
19CRS0001944

STATE OF NORTH CAROLINA

v.


INDICTMENT- I. PERJURY
II. FELONY OBSTRUCTION OF JUSTICE

LESLIE MCCRAE DOWLESS

I. The jurors for the State upon their oath present that on or about, December 3, 2016 and in Wake County, the person named above did unlawfully, willfully, corruptly, and feloniously commit perjury by making an oral statement, upon oath and solemn affirmation, knowing the statement to be false, that he did not see or possess any voter's ballot or absentee ballot container envelope other than his own and that he instructed others working for him to never touch a ballot and not to take a ballot of a voter, when in fact Defendant did collect and instruct others to collect absentee ballots that had been voted from voters in violation of the law N.C.G.S. 163A-1298(5)(fmr. 163-226.3). This false statement made under oath and solemn affirmation by Defendant was provided during a duly convened evidentiary hearing of the North Carolina State Board of Elections which, pursuant to its duties under State law, was reviewing a protest filed in challenging election results in Bladen County arising out of the 2016 General Election, and was material to an issue in these proceedings. This act was done in violation of N.C.G.S. § 14-209.

II. The jurors for the State upon their oath present that on or about December 12, 2018 in Bladen County the defendant named above unlawfully, willfully, and feloniously did conspire with Woody Hester and others, with deceit and intent to defraud, to obstruct public and legal justice to provide false and misleading information to investigators with the North Carolina State Board of Elections and other legal entities conducting investigations into absentee ballot irregularities during the 2018 General Election, to wit: Defendant, Leslie McCrae Dowless and others met to discuss what statement they would provide to investigators and agreed to "stick together" and not to tell investigators that they had collected any absentee ballots from voters knowing the information to be provided would be false and misleading. This act did obstruct

public justice by resulting in false information being provided to the North Carolina State Board of Elections investigators and the North Carolina State Bureau of Investigations thereby delaying their investigations. This offense was done with deceit and intent to defraud and against the peace and dignity of the State. This act was done in violation of the Common Law and punishable pursuant to N.C.G.S. 14-3(b).




N. Lorrin Freeman
District Attorney




Joan Fleming, Chief Investigator, NC State Board of Elections
Witness

The witnesses marked "X" were sworn by the undersigned Foreman of the Grand Jury and, after hearing testimony, this bill was found to be:


_____ **A TRUE BILL** by twelve or more grand jurors, and I the undersigned Foreman of the Grand Jury, attest the concurrence of twelve or more grand jurors in this Bill of Indictment.

_____ **NOT A TRUE BILL.**

JUL 30 2019
Date



Grand Jury Foreman